

Craig L. Fishman, Esq.

From: Craig L. Fishman, Esq.
Sent: Tuesday, December 04, 2018 4:53 PM
To: 'Lynn'
Subject: RE: 18-cv-01310-MRH Flood v. Villegas et al.

I wish I could do that, but I am not permitted to give you legal advice as that constitutes an impermissible conflict of interest.



SHENDEROVICH SHENDEROVICH & FISHMAN

CRAIG L. FISHMAN, ESQ.

**ACCIDENT & INJURY LITIGATION
CIVIL TRIAL EXPERT**

**SHENDEROVICH, SHENDEROVICH & FISHMAN, P.C.
429 4TH AVE, 11TH FLOOR, PITTSBURGH, PA 15219**

PHONE: 412-391-7610 / FAX: 412-391-1126

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From: Lynn <Shields148@hotmail.com>
Sent: Tuesday, December 04, 2018 4:47 PM
To: Craig L. Fishman, Esq. <clf@ssf-lawfirm.com>
Subject: Re: 18-cv-01310-MRH Flood v. Villegas et al.

Hi I'm not sure the steps to take. No we don't have a lawyer because I cannot afford one and I looked into a free lawyer but I'm not having any luck. I have a very busy life I'm in school full time and have 7 children and also with the holidays coming. So if you could let me know what I need to do and when it's due or forms I have to fill out. Thank you Lynn

Sent from my iPhone

On Dec 4, 2018, at 3:04 PM, Craig L. Fishman, Esq. <clf@ssf-lawfirm.com> wrote:

Mr. David Reina and Ms. Lynn Reina,

I represent the Plaintiffs in the case listed above. I am contacting you directly (using the email addresses printed on your Waiver of Service of Summons) because an attorney has not entered an appearance on your behalf. The other parties filed a variety of motions under Federal Rule of Civil Procedure 12 requesting that the court dismiss the case or strike allegations in the complaint. The case was assigned to Judge Mark Hornak, and his standard procedure requires that Plaintiffs respond to those motions within 14 days. I have a vacation in Florida planned for December 8-15, 2018 followed

by days off for Christmas and New Year's Day. All of the attorneys for the other Defendants have graciously agreed to my request for an extension until January 11, 2019 to respond to their Rule 12 motions. I am writing to request your consent to the extension. It is standard practice in Western Pennsylvania to agree to reasonable requests for an extension of time, but you are not required to consent, and you may object to the extension if you wish to do so. Please let me know by Thursday morning if you agree to an extension (federal courts are closed tomorrow due to the death of former President Bush). If you do not respond, I will provide the court with a copy of this email and state that you did not respond to it. Thanks.

<image002.png>

CRAIG L. FISHMAN, ESQ.

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Craig L. Fishman, Esq.

From: Lynn <Shields148@hotmail.com>
Sent: Tuesday, December 04, 2018 5:32 PM
To: Craig L. Fishman, Esq.
Subject: Re: 18-cv-01310-MRH Flood v. Villegas et al.

Ok then I can't grant the extension.

Sent from my iPhone

On Dec 4, 2018, at 4:55 PM, Craig L. Fishman, Esq. <clf@ssf-lawfirm.com> wrote:

You can call the Clerk of the District Court for information. I'm not permitted to tell you more than that.

<image002.png>

CRAIG L. FISHMAN, ESQ.

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To: Craig L. Fishman, Esq. <clf@ssf-lawfirm.com>
Subject: Re: 18-cv-01310-MRH Flood v. Villegas et al.

How do I file a extension? And does it cost anything?

Sent from my iPhone

On Dec 4, 2018, at 3:04 PM, Craig L. Fishman, Esq. <clf@ssf-lawfirm.com> wrote:

Mr. David Reina and Ms. Lynn Reina,

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behalf. The other parties filed a variety of motions under Federal Rule of Civil Procedure 12 requesting that the court dismiss the case or strike allegations in the complaint. The case was assigned to Judge Mark Hornak, and his standard procedure requires that Plaintiffs respond to those motions within 14 days. I have a vacation in Florida planned for December 8-15, 2018 followed by days off for Christmas and New Year's Day. All of the attorneys for the other Defendants have graciously agreed to my request for an extension until January 11, 2019 to respond to their Rule 12 motions. I am writing to request your consent to the extension. It is standard practice in Western Pennsylvania to agree to reasonable requests for an extension of time, but you are not required to consent, and you may object to the extension if you wish to do so. Please let me know by Thursday morning if you agree to an extension (federal courts are closed tomorrow due to the death of former President Bush). If you do not respond, I will provide the court with a copy of this email and state that you did not respond to it. Thanks.

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